

TECHNICAL REVIEW DOCUMENT
For
DRAFT RENEWAL OF OPERATING PERMIT 96OPWE162

Metal Container Corporation – Windsor Facility
Weld County
Source ID 123/0134

February 2013 - July 2014

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I. Purpose

This document establishes the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewed Operating Permit for the Metal Container Corporation – Windsor Facility (MCC). The previous Operating Permit for this facility was issued on September 1, 1998, was renewed on July 1, 2003, was last revised on September 1, 2006, and expired on July 1, 2008. However, since a timely and complete renewal application was submitted, under Colorado Regulation No. 3, Part C, Section IV.C all of the terms and conditions of the existing permit shall not expire until the renewal operating permit is issued and any previously extended permit shield continues in full force and operation.

Subsequent to the submittal of the renewal application, the source submitted an application on April 10, 2009 requesting that the permit be modified to increase the site-wide aluminum scrap throughput from 5,000 tons/yr to 5,500 tons/yr. Though the Division has determined that this request qualifies as a minor modification under the provisions of Colorado Regulation No. 3, Part C, Section X (see Modifications section below), the source did not request that this modification be processed as a minor modification.

This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted on June 29, 2007, the modification application submitted on April 10, 2009, comments on the draft permit submitted on [DATE], previous inspection reports and various email correspondence. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at www.colorado.gov/cdphe/airTitleV. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a

combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

II. Description of Source

Metal Container Corporation manufactures the bodies of 2 piece-aluminum beverage cans. The plant has two process lines (Lines No. 1 and 2) which have emissions from natural gas fired ovens/boilers, can forming equipment, surface coating operations and miscellaneous combustion sources. Each process line consists of front-end and back-end operations. The front-end includes cupping and bodymaking units, which form the cans from aluminum coil, followed by washers which clean the can bodies for decorating. The back-end comprises the surface coating operations. A portion of the cans made are basecoated before being routed to decorators where the exterior of the can is printed with high solid inks and roll-coated with a water-based overvarnish and rim varnish. Cans that are not basecoated are routed directly to the decorators. The inside of the can is then sprayed with a water-based coating. The can coatings are cured following each stage of surface coating (basecoating; printing/varnishing; inside spray) by heating in natural gas-fired ovens. Following the coating operations, the cans are necked, reformed, tested, and palletized prior to warehousing for shipment. The boilers supply low pressure hot water for the washers. The miscellaneous combustion sources supply building heat.

The facility is located southeast of Windsor on the north side of County Road 66 in the Windsor Industrial Park, Weld County. The area in which this facility is located is classified as attainment for all pollutants except ozone. It is classified as non-attainment for ozone and is part of the 8-hr Ozone Control Area as defined in Regulation No. 7, Section II.A.1. Wyoming is an affected state within 50 miles of the facility. Rocky Mountain National Park and the Rawah Wilderness Area are Federal Class I designated areas within 100 kilometers of the facility.

This facility is categorized as a NANSR major stationary source (Potential to Emit of VOC or $\text{NO}_x \geq 100$ Tons/Year in a nonattainment area). Future modifications at this facility resulting in a significant net emissions increase (see Reg. 3, Part D, Sections II.A.26 and 42) for VOC or NO_x or a modification which is major by itself (i.e. a Potential to Emit of ≥ 100 TPY of either VOC or NO_x) may result in the application of the NANSR review requirements.

Based on the information provided by the applicant, this source is categorized as a minor stationary source for PSD as of the issuance date of this permit. Any future modification which is major by itself (Potential to Emit of ≥ 250 TPY) for any pollutant listed in Regulation No. 3, Part D, Section II.A.42 for which the area is in attainment or attainment/maintenance may result in the application of the PSD review requirements.

Emissions

The potential to emit (PTE) for the facility is shown in the table below. The PTE values have been reduced by the amount attributed to the temporary compressor engine, since

the requirements of this engine have been removed from the operating permit (See Section VI: Other Modifications, below).

Pollutant	Potential to Emit ¹ (TPY)	Actual Emissions ² (TPY)
PM	8.4	3.55
PM ₁₀	8.4	3.55
NO _x	45	5.25
CO	38	4.38
VOC	245.0	190.2
HAPS	9.9 (any single HAP) 20 total	5.72 (formaldehyde) 9.2 Total

¹Potential to Emit is based on permitted emission limits.

²Actual emissions based on records submitted by the source for the May 2013 inspection for period April 2012 – March 2013.

Hazardous Air Pollutants (HAPs)

This facility is a minor source of HAPs. Permit limits for HAPs (any single HAP and total HAPs) were added to the permit in a September 2006 revision to the first renewal. These limits were requested by the source in order to avoid major source MACT requirements; specifically for boilers (MACT DDDDD) and metal cans (MACT KKKK). Actual HAP emissions at this facility are significantly reduced compared to the previous renewal (July 2003) due to the de-listing of Ethylene Glycol Butyl Ether (EGBE) (69 FR 69320; November 29, 2004).

III. Applicable Requirements

Accidental Release Program – 112(r)

Based on the information provided by the applicant, this facility is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).

Compliance Assurance Monitoring (CAM)

The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64 as adopted by reference into Colorado Regulation No. 3, Part C, Section XIV:

None

Controlled emissions at this facility include particulate matter emissions from the can forming operations (bodymakers and wet can elevators) and inside spray operations. Uncontrolled emissions from all bodymakers and can elevators for the can forming operations are estimated at 11.8 tons/yr using a lubricant aerosol use rate of 44.8 lb/hr (11.2 lb/hr for each bodymaker and elevator) and a lubricant aerosol water content of 94%. Uncontrolled particulate matter emissions from the inside spray operations are

estimated at 58.4 tons/yr using a total spray capacity of 38.1 gallons/hr (both lines and re-spray machine), a density 8.45 lb/gallon, a solids content of 20.7 weight percent, and an 80% transfer efficiency. Therefore, this facility has no emission unit with pre-control emissions that exceed the major source level.

Greenhouse Gases

The potential-to-emit of greenhouse gas (GHG) emissions from this facility is less than 100,000 TPY CO₂e. Future modifications greater than 100,000 TPY CO₂e may be subject to regulation (Regulation No. 3, Part A, I.B.44).

40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels

The storage vessels at this facility (for bulk storage of basecoat/sizecoat, overvarnish, and inside spray) all have a capacity of 10,000 gallons and are therefore not affected facilities for Subpart Kb according to §60.110b(a) since they do not have a capacity greater than or equal to 75m³ (19,813 gallons).

40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

Subpart IIII applies to owners and operators of compression ignition engines that commenced construction after July 11, 2005. The fire pump engine at this facility was given an APEN exempt status in 1987 and constructed with the original facility in 1988. Therefore, this engine is not subject to the requirements of Subpart IIII.

40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The fire pump engine, previously listed as an insignificant activity in Appendix A, became subject to Subpart ZZZZ with the promulgation of requirements for existing stationary compression ignition internal combustion engines at area sources on March 3, 2010. This engine is classified as an existing (commenced construction before June 12, 2006) emergency engine and is therefore subject to management practices, including inspection/replacement of belts and hoses and oil/filter changes. See Section V: Emission Sources for additional information regarding the fire pump engine.

40 CFR 63 Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers at Area Sources

This facility is exempt from the requirements of Subpart JJJJJJ per §63.11195(e), since all boilers at this facility are gas-fired boilers as defined in §63.11237.

Colorado Regulation No. 1

The boilers and heaters at this facility are subject to the opacity requirements of Sections II.A.1 and 4. The Section II.A.4 (30% opacity) requirement has been included in the operating permit as applicable during start-up (See Section VI: Other Modifications below). These units are also subject to the Section III.A.1.b particulate matter emission limit for fuel burning equipment and the Section VI.B.5.a requirement for new sources of

sulfur dioxide (SO₂ emissions shall not exceed 2 ton/day). The SO₂ emission limit has been added to the operating permit.

The Can Forming, Can Coating, and Aluminum scrap operations are subject to the opacity requirements of Section II.A.1 and 4. The Section II.A.4 (30% opacity) requirement has been included in the operating permit for these sources as applicable during start-up, process modification, and adjustment of control equipment (See Section VI: Other Modifications below). These sources are also subject to the Section III.C.1.a particulate matter (PM) emissions limit for manufacturing processes. The PM emission limit has been included in the operating permit.

Colorado Regulation No. 6

The boilers and heaters at this facility are subject to the Part B - Section II.C.2 (PM limit based on heat input) and Section II.C.3 (20% opacity limit for PM emissions) requirements for fuel burning equipment. Both of these requirements have been streamlined for the more stringent requirements of Colorado Regulation No. 1 (See Section VI: Other Modifications below).

The Can Forming, Can Coating, and Aluminum scrap operations are subject to the Part B, Section III.C.1 particulate matter emission limit and the Section III.C.3 PM opacity limit for new manufacturing processes. The Section III.C.1 particulate matter emission limit has been streamlined for the more stringent requirement of Colorado Regulation No. 1, Section III.C.1.a (See Section VI: Other Modifications below). The PM opacity limit has been included in the operating permit.

Colorado Regulation No. 7

Since the issuance of the latest revision to this operating permit, the area in which the source operates has been classified as non-attainment for ozone (designated on November 20, 2007). It is located in the 8-hour ozone control area as defined in Section II.A.1, and not in the 1-hour ozone attainment/maintenance area, therefore, the Reg. 7 requirements are State-only enforceable requirements as they apply to this facility (Section I.A.1.b).

As an existing source emitting greater than 100 tons/yr of VOC, MCC was required to submit a permit modification application including a revised APEN, and a RACT analysis, to the Division, by April 30, 2009 (Section II.C.1.c and II.C.1.c.(ii)). MCC submitted a RACT analysis on August 6, 2008 that evaluated the control of VOC emissions using a thermal oxidizer and determined that it was not economically feasible.

MCC is also subject to Section IX of Reg. 7 for surface coating operations. The Section IX.C provisions for can coating operations place limits on VOC emissions in terms of weight of VOC emitted per volume of coating applied (minus water and exempt solvents). These VOC emission limits of Section IX shall be considered presumptive RACT for MCC. Existing sources in the 8-hr ozone control area but not the 1-hr ozone attainment/maintenance area were to comply with the requirements of Reg. 7 by February 1, 2009 per Section I.B.2.d.(ii).

The fugitive emission control techniques and work practices of Section IX.A.7 had been removed from the previous permit revision since, at the time, they were inapplicable. However, these are now State-only applicable provisions for sources in the 8-hr ozone control area.

The solvent cleaning operations and parts cleaners at this facility are subject to the Reg. 7, Section X provisions for use of solvents for cleaning and degreasing. Metal Container uses only solvent cold-cleaners at the facility; the solvent in the cold cleaners is not heated or agitated, nor does it have a true vapor pressure greater than 15 torr.

This facility is also subject to the Reg. 7, Section III provisions for general requirements for storage and transfer of volatile organic compounds.

IV. Modifications Requested by the Source

A cancellation notice was submitted by MCC for the temporary diesel engine/air compressor unit (AIRS point 031) on June 25, 2014. The Division considers this unit a non-road engine, and advised MCC to submit a cancellation notice for the stationary AIRS point. (See Section VI: Other Modifications, below)

In their modification application submitted on April 10, 2009, the source requested that the permit be revised to increase the site-wide aluminum scrap throughput from 5,000 tons/yr to 5,500 tons/yr. No increase in facility-wide emissions of PM/PM₁₀ was requested with the modification and no physical change was involved. The actual increase in PM/PM₁₀ emissions due to the modification is 225 lbs/yr using the current emission factor for aluminum scrap throughput, with total potential emissions of 1.2 tons/yr. In correspondence with the Division related to the operating permit renewal issued on July 1, 2003, MCC indicated that, based on the nature of the material, it is believed that aluminum scrap processing does not create fine particulates that would become airborne. The Division accepted this position and concluded that the cyclone was part of the material processing and not provided for the control of particulate emissions. This modification is therefore not expected to increase emissions of PM_{2.5} above APEN significance levels.

Colorado Regulation No. 3, Part C, Section X.A identifies those modifications that can be processed under the minor permit modification procedures. Specifically, minor permit modifications “are not otherwise required by the Division to be processed as a significant modification” (Colorado Regulation No. 3, Part C, Section X.A.6). Since this modification does not significantly change any existing permit condition or emission limitation, violate any applicable requirements, or seek to establish a limitation in order to avoid other applicable requirements, the Division has determined that this modification can be processed as a minor modification.

The renewal application received on June 29, 2007 requested the following modifications:

- Replacement of two bottom varnish units

This action is considered to be a routine replacement and therefore does not meet the definition of modification. This replacement does not involve a physical change or change in the method of operation of the source, nor will it lead to an increase in

the emission rate, since the varnish application rate will remain the same for the new units.

- Operational flexibility for venting of emissions from the conveyor following the inside spray machines when one baghouse is down.

The source stated in an email received on January 24, 2014 that this operating scenario was not currently desired.

A new Form 2000-100 (Facility Identification Form) was submitted on January 24, 2014 to identify a new Responsible Official and permit contact for this facility.

The source's requested modifications were addressed as follows:

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- A new Responsible Official and facility contact person were identified according to information submitted by the source.

Section II – Specific Permit Terms

- Condition 4 (for Aluminum Scrap)
 - Increased the aluminum scrap throughput from 5,000 tons/yr to 5,500 tons/yr according to the modification received on April 10, 2009.

V. Emission Sources

With the promulgation of 40 CFR 63, Subpart ZZZZ requirements for existing stationary compression ignition internal combustion engines at area sources on March 3, 2010, the fire pump engine at this facility can no longer be considered an insignificant activity. This engine was previously considered an insignificant activity under the provisions of Colorado Regulation No. 3, Part C, Section II.E.3.nnn. Under the "catch-all" provisions of Colorado Regulation No. 3, Part C, Section II.E, exemptions from operating permit requirements for insignificant activities do not apply (including de minimis levels) if a source is subject to any specific federal or state requirement, including National Emissions Standards for Hazardous Air Pollutants. The fire pump engine is still exempt from APEN reporting and minor source construction permitting requirements based on actual emissions.

A. Emergency Fire Pump Engine: One (1) Caterpillar 3406TA diesel fired internal combustion engine driving a fire pump, rated at 440 HP

1. **Applicable Requirements:** The applicability of the following requirements were evaluated for the fire pump engine:
 - APEN reporting requirements

The APEN de minimis level for NO_x for units at this facility is one (1) ton per year, since this facility is located in an ozone non-attainment area. Using an emission factor of 0.031 lb/hp-hr (from AP- 42, Table 3.3-1; the largest emission factor given for diesel engines), and the rated horsepower, this

engine would exceed one ton of NO_x emissions if operated for more than 146 hours. Therefore, requirements have been included in the operating permit (Conditions 6.1 and 6.2) to monitor hours of operation and to calculate annual emissions for purposes of APEN reporting and annual fees when hours of operation exceed this level.

- Construction permitting requirements

The potential to emit for NO_x for the fire pump engine, when calculated using maximum potential operating hours of 500 per year (the EPA default assumption for emergency engines), is below the 5 tons per year exemption level found in Colorado Regulation No. 3, Part B, Section II.D.1.c. Therefore this engine remains exempt from construction permitting requirements even at maximum potential operating levels.

- Colorado Regulation No. 1

- This engine is subject to the 20% opacity standard of Section II.A.1 and the 30% opacity standard of Section II.A.4. The 20% standard is applicable at all times, except during certain operational conditions, during which the 30% standard applies. These operational conditions include building of a new fire, cleaning of fire boxes, soot blowing, start-up, process modifications and adjustment or occasional cleaning of control equipment. The Division considers that start-up is the only operational condition of Section II.A.4 that applies to this engine. A Method 9 opacity observation will normally be required once a year, with a second observation required if the engine is operated for more than 250 hours.
- Section VI.B.4.b.(i) includes an emission limitation for SO₂ for oil-fired units with a heat input of less than 250 MMBtu/hr of 0.8 lb/MMBtu that is applicable to this engine. The uncontrolled emission factor for diesel-fired engines in AP-42 (Table 3.3-1, used to estimate emissions from this engine) is 0.29 lb/MMBtu, which is well below the 0.8 lb/MMBtu limit. In absence of credible evidence to the contrary, this engine may be presumed to be in compliance with the SO₂ limit since they are only permitted to burn diesel fuel.

- 40 CFR Part 63, Subpart ZZZZ – Reciprocating Internal Combustion Engine (RICE) MACT

Since this engine is an existing emergency engine it is only subject to management practices, including inspection/replacement of belts and hoses and oil/filter changes. These requirements have been designated as Federal-Only requirements since Colorado has not adopted the area source provisions of Subpart ZZZZ. The provisions for engine operation during emergency demand response, voltage and frequency deviation, and non-emergency situations related to electricity generation have not been included in the operating permit since this engine is used solely as a fire pump engine, and is not configured as an electric generator.

This engine is also subject to the requirements of 40 CFR Part 63, Subpart A; General Provisions. Since this engine is an existing unit that is not subject to any emission limitations or monitoring, notification or reporting requirements, the provisions of §63.5, 63.7, 63.8, 63.9 and 63.10 do not apply. In addition, Table 8 of Subpart ZZZZ indicates that the operation and maintenance requirements of §63.6(e) do not apply. Therefore, only the prohibition and circumvention requirements of §63.4 have been included in the operating permit.

VI. Other Modifications

In addition to the source requested modifications, the Division has included changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal. These changes are as follows:

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- It should be noted that the monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on permit issuance date. Note that the source may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. However, it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e. less than 6 months and less than 1 year).

Section I – General Activities and Summary

- Revised the language in Condition 1.4 to include current conditions that are state-only enforceable.
- Revised Condition 3 to identify the source as a major stationary source for Nonattainment area New Source Review (NANSR), since the area in which the plant operates is part of the 8-hour Ozone Control Area.
- Condition 6 (Summary of Emission Units)
 - The APEN/permit exempt sources (heaters) were removed from this list. These are included in the list of insignificant activities in Appendix A.
 - The temporary compressor engine (point 031) was removed from the list since these engines have been classified as non-road engines.

Section II – Specific Permit Terms

- The facility-wide emission limits were revised throughout Section II to account for the reduction in emission limits associated with the removal of the temporary compressor engine (see below). VOC emission limits remained unchanged since

there was no increase in the VOC emission limit when the temporary compressor engine was added to the permit. The amounts removed from the facility-wide emission limits were: NO_x – 37.2 tons/yr; CO – 8.0 tons/yr; PM/PM₁₀ – 2.6 tons/yr.

- Condition 1 (Fuel Burning Equipment)
 - Removed the insignificant fuel burning sources from the facility description.
 - Condition 1.1 was revised to clarify that the emission limits in the summary table for Condition 1 are facility-wide emission limits and to be more consistent with emission limit conditions for other emission units at this facility and with recently issued permits.
 - The Colorado Regulation No. 1, Section II.A.4 30% opacity requirement, for certain operational activities, has been added to the 20% opacity limit of Condition 1.4 since this is an applicable requirement. The Division has concluded that the operational activities of building of a new fire, cleaning of fire boxes, soot blowing, any process modification, or adjustment or cleaning of control equipment do not apply to the fuel burning equipment at this facility. Therefore, only the start-up condition has been included in this requirement. Compliance with these opacity requirements will be presumed since natural gas is the only fuel permitted for use in these units.
 - The Colorado Regulation No. 1, Section VI.B.5.a requirement for sources of sulfur dioxide has been added to the operating permit since this is an applicable requirement. Compliance with this requirement will be presumed since natural gas is the only fuel permitted for use in these units.
- Condition 2 (Can Forming Operations)
 - The emission factor in the summary table for Condition 2 has been revised to 0.2 lb/hr per production line. The emission factors for the oil misting operations and can elevator operations were listed separately in the original operating permit and were each given an emission factor of 0.1 lb/hr per production line. These factors should have been summed when the point assignments and conditions were rearranged for the first renewal.
 - Condition 2.1 was revised to be more consistent with emission limit conditions for other emission units at this facility and with recently issued permits.
 - Condition 2.2.1 was revised to include the required operation of the wet can inverter mist filters when the wet can elevators are in operation. This condition previously only specified that the mist eliminators with filters shall operate when the oil mist lubrication systems were in operation.
 - The Colorado Regulation No. 1, Section II.A.4 30% opacity requirement, for certain operational activities, has been added to the 20% opacity limit of Condition 2.3 since this is an applicable requirement. The Division has determined that the operational activities of fire building, cleaning of fire boxes, and soot blowing do not apply to this source, therefore, the 30% opacity requirement will only include the operational activities of start-up,

process modification, and adjustment or occasional cleaning of control equipment. The Colorado Regulation No. 6, Part B, Section III.C.3 20% opacity limit for particulate matter for new manufacturing processes has also been added to Condition 2.3 as an applicable requirement. Though this requirement is not applicable during startup, shutdown, and malfunction (per 40 CFR 60 Subpart A, §60.11(c), adopted by reference in Reg. 6, Part B, Section I.A), this requirement is more stringent than the Reg. 1 30% opacity requirement during the operational activities of process modification and adjustment or occasional cleaning of control equipment.

A qualitative visual emissions observation will be required once a month to monitor compliance with the opacity limits, with a Method 9 reading required when visual emissions are observed for more than 6 minutes. No additional monitoring has been required to demonstrate compliance with the Reg. 1 30% opacity requirement, since, based on engineering judgment, these operational activities are not likely to cause an increase in opacity emissions for this source.

- Condition 2.4 has been added to the operating permit to include the Colorado Regulation No. 1, Section III.C.1.a requirement for PM emissions from manufacturing processes since this is an applicable requirement.

Compliance with this requirement shall be presumed when the oil mist elimination system and wet can inverter mist filters are operated and maintained according to Condition 2.2.

- Condition 3 (Can Coating Operations)
 - Condition 3.1 was revised to be more consistent with emission limit conditions for other emission units at this facility and with recently issued permits.
 - Condition 3.3 (monitoring of material consumption) was revised to specify that recorded material consumption shall be used to calculate emissions according to Condition 3.1, as well as for determination of the need to file a revised APEN. This condition previously only specified that recorded data be used to determine the need to file a revised APEN.
 - Condition 3.4 (NSPS WW) was revised to include more of the requirements of this rule specific to the source.
 - The Colorado Regulation No. 1, Section II.A.4 30% opacity requirement, for certain operational activities, has been added to the 20% opacity limit of Condition 3.7 since this is an applicable requirement. The Division has determined that the operational activities of fire building, cleaning of fire boxes, and soot blowing do not apply to this source, therefore, the 30% opacity requirement will only include the operational activities of start-up, process modification, and adjustment or occasional cleaning of control equipment. The Colorado Regulation No. 6, Part B, Section III.C.3 20% opacity limit for particulate matter for new manufacturing processes has also been added to Condition 3.7 as an applicable requirement. Though this

requirement is not applicable during startup, shutdown, and malfunction (per 40 CFR 60 Subpart A, §60.11(c), adopted by reference in Reg. 6, Part B, Section I.A), this requirement is more stringent than the Reg. 1 30% opacity requirement during the operational activities of process modification and adjustment or occasional cleaning of control equipment.

A qualitative visual emissions observation will be required once a month to monitor compliance with this opacity limit, with a Method 9 reading required when visual emissions are observed for more than 6 minutes. No additional monitoring has been required to demonstrate compliance with the Reg. 1 30% opacity requirement, since, based on engineering judgment, these operational activities are not likely to cause an increase in opacity emissions for this source.

- Condition 3.9 has been added to the operating permit to include the applicable requirements of Colorado Regulation No. 7. These state-only enforceable requirements have become applicable since the latest revision to the operating permit because the area is now designated as an ozone non-attainment area. These requirements include VOC emission limits for can coating operations as well as maintenance, operating, and work practice requirements for VOC storage and transfer, fugitive emission control, and use of solvents.
- Condition 3.10 has been added to the operating permit to include the Colorado Regulation No. 1, Section III.C.1.a requirement for PM emissions from manufacturing processes since this is an applicable requirement.
- Condition 4 (Aluminum Scrap)
 - Condition 4.1 was revised to be more consistent with emission limit conditions for other emission units at this facility and with recently issued permits.
 - Condition 4.2 (monitoring of scrap aluminum throughput) was revised to specify that the recorded scrap aluminum throughput shall be used to calculate emissions according to Condition 4.1, as well as for determination of the need to file a revised APEN. This condition previously only specified that recorded data be used to determine the need to file a revised APEN.
 - The Colorado Regulation No. 1, Section II.A.4 30% opacity requirement, for certain operational activities, has been added to the 20% opacity limit of Condition 4.5 since this is an applicable requirement. The Division has determined that the operational activities of fire building, cleaning of fire boxes, and soot blowing do not apply to this source, therefore, the 30% opacity requirement will only include the operational activities of start-up, process modification, and adjustment or occasional cleaning of control equipment. The Colorado Regulation No. 6, Part B, Section III.C.3 20% opacity limit for particulate matter for new manufacturing processes has also been added to Condition 4.5 as an applicable requirement. Though this requirement is not applicable during startup, shutdown, and malfunction (per 40 CFR 60 Subpart A, §60.11(c), adopted by reference in Reg. 6, Part B,

Section I.A), this requirement is more stringent than the Reg. 1 30% opacity requirement during the operational activities of process modification and adjustment or occasional cleaning of control equipment.

Compliance with these opacity requirements will be presumed based on the type of material processed, the method of operation, and the required operation and maintenance of the cyclone in Condition 4.3.

- Condition 5 (Insignificant Activities)
 - Condition 5.2 was revised to remove the limit on glycol ether emissions from insignificant activities. This facility's actual emissions of glycol ethers are no longer approaching the major source level of 10 tons/yr (single HAP); therefore the limit on glycol ether emissions from insignificant activities is unnecessary. HAP emissions from all insignificant activities (for all HAPs) are still required to be monitored to verify compliance with the 9.9 ton/yr limit on single HAP emissions.
- The requirements for the temporary diesel engine/air compressor unit (formerly Condition 6) have been removed from the operating permit. The Division considers this unit a non-road engine. Diesel fuel fired air compressors are brought in to the facility on a temporary basis to back up electric air compressors when they break down or require servicing. These units are therefore transportable and meet the definition of a non-road engine found in Colorado Regulation No. 3, Part A, Section I.B.31.a.(iii). Non-road engines are exempt from APEN filing requirements per Colorado Regulation No. 1, Part A, Section II.D.1.dddd.

An engine that remains or will remain at a location (any single site at a building, structure, facility, or installation) for more than twelve consecutive months will not be considered a non-road engine per Colorado Regulation No. 3, Part A, Section I.B.31.b.(iii).

This facility may still be subject to non-road engine requirements for these temporary units if the aggregation of operating hours for engines with a site-rated horsepower of 1,200 or greater is more than 4,380 hours per year at the same location. (per Colorado Regulation No. 3, Part A, Section I.B.31.c)

- Requirements for the emergency fire pump engine (current Condition 6) have been included in the operating permit. This engine can no longer be considered an insignificant activity and is subject to operating permit requirements since it is now subject to the area source provisions of MACT ZZZZ. (see Section V: Emission Sources above)

Section III – Permit Shield

- Condition 3 – Streamlined Conditions
 - A summary table has been added to Condition 3 describing the streamlining of the following applicable requirements according to the justifications below:

Fuel Burning Equipment

Opacity

The fuel burning emission sources at this facility are subject to the Colorado Reg. 1 opacity requirements of 30% during certain operational activities (Reg. 1, Section II.A.4) and 20% at all other times (Reg. 1, Section II.A.1). These units are also subject to the state-only Colorado Reg. 6, Part B 20% opacity requirement for particulate matter (Reg. 6, Part B, Section II.C.3). Since the Reg. 6 opacity requirement is not applicable during periods of startup, shutdown, and malfunction (per 40 CFR 60 Subpart A, §60.11(c), adopted by reference in Reg. 6, Part B, Section I.A), and the Division has determined that startup is the only operational activity of the Reg. 1 30% opacity requirement that applies to these sources, the Reg. 1 opacity requirements are always equal to or more stringent than the Reg. 6 requirements, and the Reg. 6 requirements have been streamlined out of the permit.

Particulate Matter

Regulation No. 1 (Section III.A.1.b) and Regulation No. 6 (Part B, Section II.C.2) contain the same particulate matter emission requirements for fuel burning equipment: emissions of particulate matter shall not exceed $0.5(FI)^{0.26}$ where FI = fuel input in MMBtu/hr. The Regulation No. 6, Part B requirement is a state-only requirement. Regulation No. 6, Part B, Section I.A, adopts, by reference, the 40 CFR Part 60 Subpart A general provisions. Although not specifically stated in the general provisions, the Division has concluded, after reviewing EPA determinations, that the NSPS standards are not applicable during startup, shutdown and malfunction, although any excess emissions during these periods must be reported in the excess emission reports. Therefore, the Division considers that the Regulation No. 6, Part B particulate matter requirements do not apply during periods of startup, shutdown, and malfunction. The Regulation No. 1 requirements are therefore more stringent than the Regulation No. 6 requirements, and the Regulation No. 6 requirements have been streamlined out of the permit.

Can Forming, Can Coating, and Aluminum Scrap Operations

Particulate Matter

Colorado Regulation No. 1 (Section III.C.1.a) and No. 6 (Part B, Section III.C.1) contain the same particulate matter emission limit for manufacturing processes with design rates less than 30 tons/hr: emissions of particulate matter shall not exceed $PE = 3.59(P)^{0.62}$, where PE = particulate emissions in lb/hr and P = process weight rate in tons/hr. The Regulation No. 6, Part B requirement is a state-only requirement. Regulation No. 6, Part B, Section I.A, adopts, by reference, the 40 CFR Part 60 Subpart A general provisions. Although not specifically stated in the general provisions, the Division has concluded, after reviewing EPA determinations, that the NSPS standards are not applicable during startup, shutdown and malfunction, although any excess emissions during these periods must be reported in excess emission reports. Therefore, the Division considers that the Regulation No. 6, Part B particulate

matter requirements do not apply during periods of startup, shutdown, and malfunction. The Regulation No. 1 requirements are therefore more stringent than the Regulation No. 6 requirements, and the Regulation No. 6 requirements have been streamlined out of the permit.

Section IV – General Permit Conditions

- Updated the general permit conditions to the current version (5/22/2012)

Appendices

- Updated Appendices B and C (Monitoring and Permit Deviation Reports and Compliance Certification Reports) to the newest versions (8/20/2014).
- EPA's mailing address was revised (Appendix D).
- Cleared the list of modifications from Appendix F related to the previous issuance.